

BRUCE LOCKE (#177787)
Moss & Locke
555 University Avenue, Suite 170
Sacramento, CA 95825
(916) 569-0667
(916) 569-0665 fax
Attorneys for
JESUS RODRIGUEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:04-cr-00387-MCE
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE
)	STATUS CONFERENCE FROM
v.)	SEPTEMBER 6, 2007 TO OCTOBER 11,
)	2007 AT 9:00 A.M. AND EXCLUDE
JESUS RODRIGUEZ,)	TIME UNDER SPEEDY TRIAL ACT
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED between the defendant, Jesus Rodriguez, and the United States of America, through defense counsel, Bruce Locke and Assistant U.S. Attorney Phillip Talbert, that the Status Conference set for September 6, 2007 should be continued to October 11, 2007 at 9:00 a.m. The reason for the continuance is that the defense has learned recently received additional discovery from the government concerning the two witnesses who will testify that they purchased drugs from the defendant prior to the time of the first sale identified in the indictment and this information materially affects the defense of entrapment. The defense must review all of the discovery relating to these two witnesses and needs additional time to complete that review. The parties agree that the time between September 6, 2007 and October 11, 2007 should be excluded from the Speedy Trial computation for the reason that the additional time is needed for defense preparation. Mr. Talbert has authorized the undersigned to sign this Stipulation and Order for him.

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1 DATED: September 4, 2007


/S/ Bruce Locke
BRUCE LOCKE
Attorney for Mr. Jesus Rodriguez

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6 DATED: September 4, 2007

/S/ Bruce Locke
for PHILLIP TALBERT
Assistant U.S. Attorney

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13 IT IS SO ORDERED.

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15 Dated: September 6, 2007

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17 MORRISON C. ENGLAND, JR.
18 UNITED STATES DISTRICT JUDGE
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